

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL SAVEONSP'S MOTION TO COMPEL JJHCS TO
PRODUCE DOCUMENTS RESPONSIVE TO REQUEST NOS. 107 AND 108 RELATED TO FRAS CONTRACTS
(ECF NOS. 519, 532 & 566)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to Produce Documents Responsive to Request Nos. 107 and 108 Related to FRAS Contracts, dated February 3, 2025 (ECF No. 519)</u>		JJHCS requests the redaction of information in and exhibits to the February 3, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. In addition, JJHCS designated Exhibit 9 as Attorneys' Eyes Only – Confidential Health Information. Further, Exhibit 26 was produced by non-party RisRX and designated	If filed on the public docket, these portions of the February 3, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 2–9 and notes 1–2	Redactions discussing confidential exhibits					
Exhibits 1, 2, 4, 5, 7, 8–17, 19, 20, 25, 29–33, 35, & 37	Sealing of emails and attachments discussing confidential information					

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Exhibits 3, 6, & 34	Sealing of confidential documents and presentations containing competitively sensitive information	as Highly Confidential Attorneys' Eyes Only.	competitors secured the information.			
Exhibit 18	Sealing of notes containing confidential information					
Exhibit 23	Redactions to discovery letter discussing confidential documents					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
Exhibits 26–28	Sealing of confidential agreements containing competitively sensitive information					
Exhibit 36	Sealing of confidential work order containing competitively sensitive information					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's Motion to Compel JJHCS to Produce Documents Responsive to Request Nos. 107 and 108 Related to FRAS Contracts, dated February 21, 2025 (ECF No. 532)</u>		JJHCS requests the redaction of information in and exhibits to the February 21, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the February 21, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None, except for Exhibit 2, which was redacted per ECF No. 473	None
Pages 2, 4–7	Redactions discussing confidential exhibits					
Exhibit 1	Redactions to opposition to motion to compel					

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Exhibit 2	Redactions to discovery letter discussing confidential documents		disadvantage if its competitors secured the information.			
Exhibits 3–5	Sealing of confidential documents and presentations containing competitively sensitive information					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to SaveOnSP's Motion to Compel JJHCS to Produce Documents Responsive to Request Nos. 107 and 108 Related to FRAS Contracts, dated March 11, 2025 (ECF No. 566)</u>		JJHCS requests the redaction of information in and exhibits to the March 11, 2025 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the March 11, 2025 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 1–4 and notes 2 & 3	Redactions discussing confidential exhibits					
Exhibits 38	Sealing of presentation containing confidential information					

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Exhibits 39–42	Sealing of emails and attachments discussing confidential information		competitors secured the information.			